



June 17, 2022

Public Safety and Homeland Security Bureau
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

SUBJECT: Final Substantial Service Showing Benchmark for Call Sign WPTZ774

To Whom It May Concern:

This letter is intended to notify the Federal Communications Commission (Commission) that the California Office of Emergency Services (Cal OES) does not accept the proposed modification to remove 23 of the State of California's (State) license call sign WPTZ774. Please see the subsequent information in this letter to serve as justification for the State to retain all channels covered by call sign WPTZ774.

The Commission's rule section 90.529 (b)(2) requires the State to "certify on or before the applicable benchmark that it is providing or prepared to provide 'substantial service' to two-thirds of their population or territory by June 13, 2019." Rule Section 90.529 (c) states "The Commission will deem a state 'prepared to provide 'substantial service' if the licensee certifies that a radio system has been approved and funded for implementation by the deadline date. 'Substantial service' refers to the construction of 700 MHz facilities by public safety entities providing service which is sound, favorable, and substantially above a level of mediocre service which just might minimally warrant renewal." On June 10, 2019, the State filed documentation showing to demonstrate compliance with the Commission's final substantial service benchmark for coverage of two-thirds of the State's population prior to the deadline of June 13, 2019. Since then, the State has continued expanding and implementing all 96 channels under the call sign WPTZ774 to provide coverage to more than two-thirds of the state population.



The June 10, 2019, filing indicated that the State is in the engineering design phase of the California Radio Interagency System (CRIS), a non-simulcast, trunked radio system that will operate on channels from the State's 700 MHz allocation. Funding for the CRIS was granted in the fall of 2018 and the initial phase of six (6) locations and coverage was described in the State's 2019 filing. However, the 2019 filing did not list the channels that are now used and assigned to the CRIS trunking system. Currently, there are 35 sites with CRIS trunked radios in operation throughout the State of California. All 700 MHz channels allocated to the State are in use. Please refer to the attached "State of California, 700 MHz Agency Channel Assignments" for reference.

In addition to the expanded use of the State's 700 MHz allocation, the State is conversing with two (2) of California's 700 MHz Regional Planning Committees (Region 5 and Region 6) to acquire additional 700 MHz channels from the "General Use" pool to support its public safety agencies. The State has a plan in place to build more 700 MHz sites for CRIS and other state agencies. Removing 23 channels from call sign WPTZ774 will severely impact the State's capability to expand the CRIS trunked radio system. Cal OES urges the Commission to allow the State of California to retain its 700 MHz allocation in its entirety.

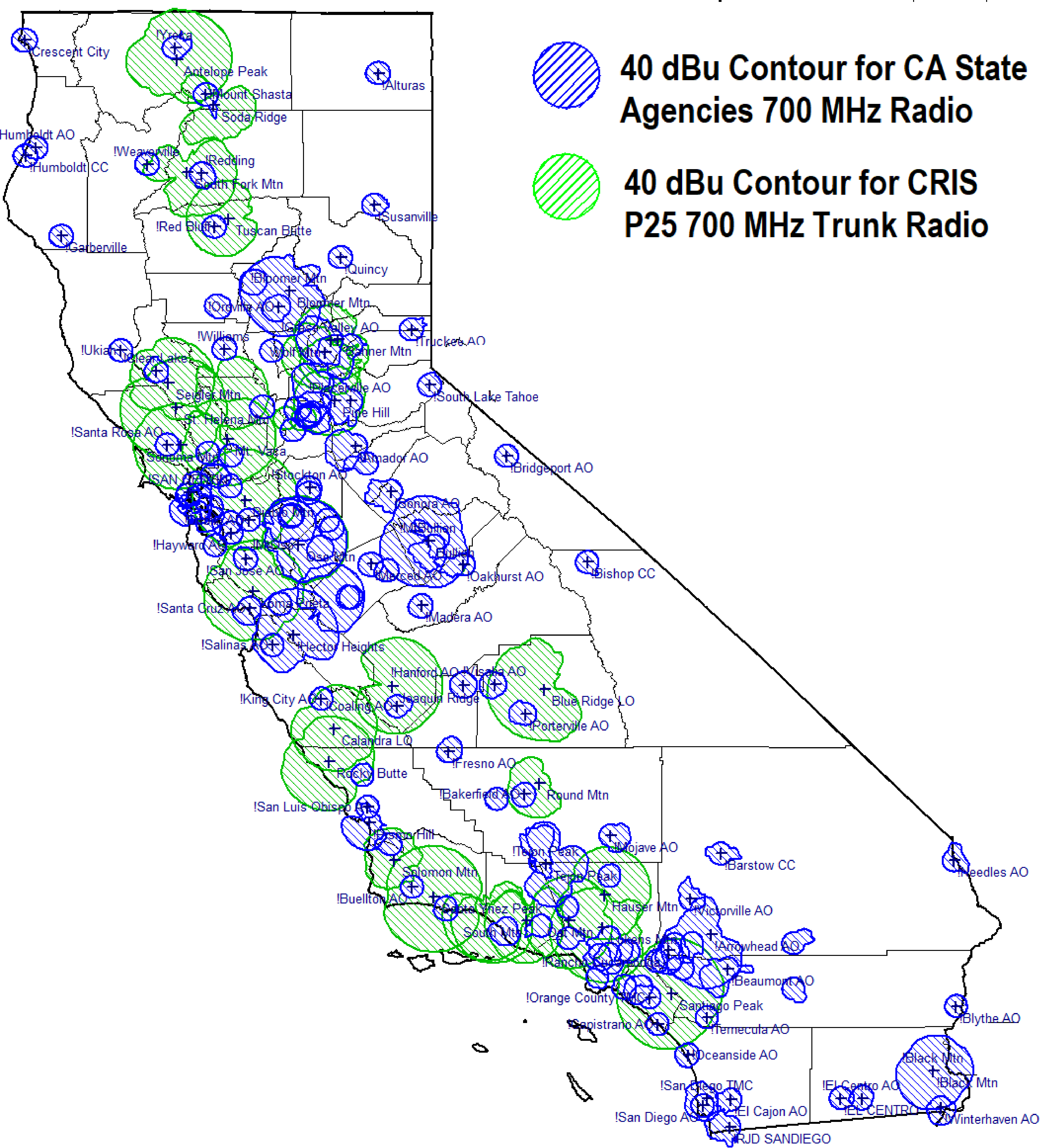
If you have any questions, please contact me by email at Deneke.Mattewos@CalOES.ca.gov or by telephone at (916) 894-5096.

Sincerely,

Senior Telecommunications Engineer

Attachments:

State of California, 700 MHz Agency Channel Assignments
700 MHz 40dBu Contour



State of California, 700 MHz Agency Channel Assignments

BASE CH #	BASE FREQ **		MOBILE FREQ (+30)	MOBILE CH #		Agency / Location / Area
25	769.15000		799.15000	985		CDCR(LMR)
26	769.15625		799.15625	986		CDCR(LMR)
27	769.16250		799.16250	987		CHP(VRS)
28	769.16875		799.16875	988		CHP(VRS)
29	769.17500		799.17500	989		CHP(VRS)
30	769.18125		799.18125	990		CHP(VRS)
31	769.18750		799.18750	991		CHP(VRS)
32	769.19375		799.19375	992		CHP(VRS)
33	769.20000		799.20000	993		CRIS (Trunk P25 Phase-2)
34	769.20625		799.20625	994		CRIS (Trunk P25 Phase-2)
35	769.21250		799.21250	995		CHP(VRS)
36	769.21875		799.21875	996		CHP(VRS)
65	769.40000		799.40000	1025		CRIS (Trunk P25 Phase-2)
66	769.40625		799.40625	1026		CRIS (Trunk P25 Phase-2)
67	769.41250		799.41250	1027		CHP(VRS)
68	769.41875		799.41875	1028		CHP(VRS)
69	769.42500		799.42500	1029		CHP(VRS)
70	769.43125		799.43125	1030		CHP(VRS)
71	769.43750		799.43750	1031		CHP(VRS)
72	769.44375		799.44375	1032		CHP(VRS)
73	769.45000		799.45000	1033		DOT(LMR)/CDCR(LMR)
74	769.45625		799.45625	1034		DOT(LMR)/CDCR(LMR)
75	769.46250		799.46250	1035		CHP(VRS)
76	769.46875		799.46875	1036		CHP(VRS)
105	769.65000		799.65000	1065		CDCR(LMR)
106	769.65625		799.65625	1066		CDCR(LMR)
107	769.66250		799.66250	1067		CHP(VRS)
108	769.66875		799.66875	1068		CHP(VRS)
109	769.67500		799.67500	1069		CHP(VRS)
110	769.68125		799.68125	1070		CHP(VRS)
111	769.68750		799.68750	1071		CHP(VRS)
112	769.69375		799.69375	1072		CHP(VRS)
113	769.70000		799.70000	1073		DOT(LMR)
114	769.70625		799.70625	1074		DOT(LMR)
115	769.71250		799.71250	1075		CHP(VRS)
116	769.71875		799.71875	1076		CHP(VRS)
117-118	RESERVE					

State of California, 700 MHz Agency Channel Assignments

BASE CH #	BASE FREQ		MOBILE FREQ (+30)	MOBILE CH #	Agency / Location / Area
145	769.90000		799.90000	1105	CDCR(LMR) / CRIS (Trunk P25 Phase-2)
146	769.90625		799.90625	1106	CDCR(LMR) / CRIS (Trunk P25 Phase-2)
147	769.91250		799.91250	1107	CHP(VRS)
148	769.91875		799.91875	1108	CHP(VRS)
149	769.92500		799.92500	1109	CHP(VRS)
150	769.93125		799.93125	1110	CHP(VRS)
151	769.93750		799.93750	1111	CHP(VRS)
152	769.94375		799.94375	1112	CHP(VRS)
153	769.95000		799.95000	1113	CRIS (Trunk P25 Phase-2)
154	769.95625		799.95625	1114	CRIS (Trunk P25 Phase-2)
155	769.96250		799.96250	1115	CHP(VRS) / CRIS (Trunk P25 Phase-2)
156	769.96875		799.96875	1116	CHP(VRS) / CRIS (Trunk P25 Phase-2)
185	770.15000		800.15000	1145	CRIS (Trunk P25 Phase-2)
186	770.15625		800.15625	1146	CRIS (Trunk P25 Phase-2)
187	770.16250		800.16250	1147	CDCR(LMR) / CRIS (Trunk P25 Phase-2)
188	770.16875		800.16875	1148	CDCR(LMR) / CRIS (Trunk P25 Phase-2)
189	770.17500		800.17500	1149	CSP(LMR)
190	770.18125		800.18125	1150	CSP(LMR)
191	770.18750		800.18750	1151	CHP(LMR)
192	770.19375		800.19375	1152	CHP(LMR)
193	770.20000		800.20000	1153	CRIS (Trunk P25 Phase-2)
194	770.20625		800.20625	1154	CRIS (Trunk P25 Phase-2)
195	770.21250		800.21250	1155	ABC Statewide VRS
196	770.21875		800.21875	1156	ABC Statewide VRS
225	770.40000		800.40000	1185	CRIS (Trunk P25 Phase-2)
226	770.40625		800.40625	1186	CRIS (Trunk P25 Phase-2)
227	770.41250		800.41250	1187	CSP(VRS)
228	770.41875		800.41875	1188	CSP(VRS)
229	770.42500		800.42500	1189	CHP(LMR)
230	770.43125		800.43125	1190	CHP(LMR)
231	770.43750		800.43750	1191	CRIS (Trunk P25 Phase-2)
232	770.44375		800.44375	1192	CRIS (Trunk P25 Phase-2)
233	770.45000		800.45000	1193	DOT(LMR) / CRIS (Trunk P25 Phase-2)
234	770.45625		800.45625	1194	DOT(LMR) / CRIS (Trunk P25 Phase-2)
235	770.46250		800.46250	1195	CDCR(LMR) / CRIS (Trunk P25 Phase-2)
236	770.46875		800.46875	1196	CDCR(LMR) / CRIS (Trunk P25 Phase-2)

State of California, 700 MHz Agency Channel Assignments

BASE CH #	BASE FREQ		MOBILE FREQ (+30)	MOBILE CH #	Agency / Location / Area
265	770.65000		800.65000	1225	CRIS (Trunk P25 Phase-2)
266	770.65625		800.65625	1226	CRIS (Trunk P25 Phase-2)
267	770.66250		800.66250	1227	CHP(LMR)
268	770.66875		800.66875	1228	CHP(LMR)
269	770.67500		800.67500	1229	CSP(LMR)
270	770.68125		800.68125	1230	CSP(LMR)
271	770.68750		800.68750	1231	CDCR(LMR) / CRIS (Trunk P25 Phase-2)
272	770.69375		800.69375	1232	CDCR(LMR) / CRIS (Trunk P25 Phase-2)
273	770.70000		800.70000	1233	CDCR(LMR)
274	770.70625		800.70625	1234	CDCR(LMR)
275	770.71250		800.71250	1235	DFW(VRS)
276	770.71875		800.71875	1236	DFW(VRS)
305	770.90000		800.90000	1265	CRIS (Trunk P25 Phase-2)
306	770.90625		800.90625	1266	CRIS (Trunk P25 Phase-2)
307	770.91250		800.91250	1267	CRIS (Trunk P25 Phase-2)
308	770.91875		800.91875	1268	CRIS (Trunk P25 Phase-2)
309	770.92500		800.92500	1269	CALOES(LMR)
310	770.93125		800.93125	1270	CALOES(LMR)
311	770.93750		800.93750	1271	CRIS (Trunk P25 Phase-2)
312	770.94375		800.94375	1272	CRIS (Trunk P25 Phase-2)
313	770.95000		800.95000	1273	CRIS (Trunk P25 Phase-2)
314	770.95625		800.95625	1274	CRIS (Trunk P25 Phase-2)
315	770.96250		800.96250	1275	CDCR(LMR) / CRIS (Trunk P25 Phase-2)
316	770.96875		800.96875	1276	CDCR(LMR) / CRIS (Trunk P25 Phase-2)
645	773.02500		803.02500	1605	CRIS (Trunk P25 Phase-2)
646	773.03125		803.03125	1606	CRIS (Trunk P25 Phase-2)
647	773.03750		803.03750	1607	CSP(LMR)
648	773.04375		803.04375	1608	CSP(LMR)
649	773.05000		803.05000	1609	CALOES(LMR) / CRIS (Trunk P25 Phase-2)
650	773.05625		803.05625	1610	CALOES(LMR) / CRIS (Trunk P25 Phase-2)
651	773.06250		803.06250	1611	CRIS (Trunk P25 Phase-2)
652	773.06875		803.06875	1612	CRIS (Trunk P25 Phase-2)
653	773.07500		803.07500	1613	CHP(LMR) / CRIS (Trunk P25 Phase-2)
654	773.08125		803.08125	1614	CHP(LMR) / CRIS (Trunk P25 Phase-2)
655	773.08750		803.08750	1615	CSP(LMR)
656	773.09375		803.09375	1616	CSP(LMR)

State of California, 700 MHz Agency Channel Assignments

BASE CH #	BASE FREQ		MOBILE FREQ (+30)	MOBILE CH #	Agency / Location / Area
685	773.27500		803.27500	1645	CRIS (Trunk P25 Phase-2)
686	773.28125		803.28125	1646	CRIS (Trunk P25 Phase-2)
687	773.28750		803.28750	1647	CHP(LMR) / CRIS (Trunk P25 Phase-2)
688	773.29375		803.29375	1648	CHP(LMR) / CRIS (Trunk P25 Phase-2)
689	773.30000		803.30000	1649	CRIS (Trunk P25 Phase-2)
690	773.30625		803.30625	1650	CRIS (Trunk P25 Phase-2)
691	773.31250		803.31250	1651	CRIS (Trunk P25 Phase-2)
692	773.31875		803.31875	1652	CRIS (Trunk P25 Phase-2)
693	773.32500		803.32500	1653	CHP(LMR)
694	773.33125		803.33125	1654	CHP(LMR)
695	773.33750		803.33750	1655	CRIS (Trunk P25 Phase-2)
696	773.34375		803.34375	1656	CRIS (Trunk P25 Phase-2)
725	773.52500		803.52500	1685	CHP(LMR)
726	773.53125		803.53125	1686	CHP(LMR)
727	773.53750		803.53750	1687	CRIS (Trunk P25 Phase-2)
728	773.54375		803.54375	1688	CRIS (Trunk P25 Phase-2)
729	773.55000		803.55000	1689	CHP(LMR) / CRIS (Trunk P25 Phase-2)
730	773.55625		803.55625	1690	CHP(LMR) / CRIS (Trunk P25 Phase-2)
731	773.56250		803.56250	1691	CRIS (Trunk P25 Phase-2)
732	773.56875		803.56875	1692	CRIS (Trunk P25 Phase-2)
733	773.57500		803.57500	1693	CHP(LMR) / CRIS (Trunk P25 Phase-2)
734	773.58125		803.58125	1694	CHP(LMR) / CRIS (Trunk P25 Phase-2)
735	773.58750		803.58750	1695	CRIS (Trunk P25 Phase-2)
736	773.59375		803.59375	1696	CRIS (Trunk P25 Phase-2)
765	773.77500		803.77500	1725	CHP(LMR) / CRIS (Trunk P25 Phase-2)
766	773.78125		803.78125	1726	CHP(LMR) / CRIS (Trunk P25 Phase-2)
767	773.78750		803.78750	1727	CRIS (Trunk P25 Phase-2)
768	773.79375		803.79375	1728	CRIS (Trunk P25 Phase-2)
769	773.80000		803.80000	1729	CHP(LMR) / CRIS (Trunk P25 Phase-2)
770	773.80625		803.80625	1730	CHP(LMR) / CRIS (Trunk P25 Phase-2)
771	773.81250		803.81250	1731	CRIS (Trunk P25 Phase-2)
772	773.81875		803.81875	1732	CRIS (Trunk P25 Phase-2)
773	773.82500		803.82500	1733	CHP(LMR)
774	773.83125		803.83125	1734	CHP(LMR)
775	773.83750		803.83750	1735	CDCR(LMR) / CRIS (Trunk P25 Phase-2)
776	773.84375		803.84375	1736	CDCR(LMR) / CRIS (Trunk P25 Phase-2)

State of California, 700 MHz Agency Channel Assignments

BASE CH #	BASE FREQ		MOBILE FREQ (+30)	MOBILE CH #	Agency / Location / Area
805	774.02500		804.02500	1765	CRIS (Trunk P25 Phase-2)
806	774.03125		804.03125	1766	CRIS (Trunk P25 Phase-2)
807	774.03750		804.03750	1767	CRIS (Trunk P25 Phase-2)
808	774.04375		804.04375	1768	CRIS (Trunk P25 Phase-2)
809	774.05000		804.05000	1769	CHP(LMR) / CRIS (Trunk P25 Phase-2)
810	774.05625		804.05625	1770	CHP(LMR) / CRIS (Trunk P25 Phase-2)
811	774.06250		804.06250	1771	CRIS (Trunk P25 Phase-2)
812	774.06875		804.06875	1772	CRIS (Trunk P25 Phase-2)
813	774.07500		804.07500	1773	CHP(LMR) / CRIS (Trunk P25 Phase-2)
814	774.08125		804.08125	1774	CHP(LMR) / CRIS (Trunk P25 Phase-2)
815	774.08750		804.08750	1775	CDCR(LMR)
816	774.09375		804.09375	1776	CDCR(LMR)
845	774.27500		804.27500	1805	CRIS (Trunk P25 Phase-2)
846	774.28125		804.28125	1806	CRIS (Trunk P25 Phase-2)
847	774.28750		804.28750	1807	CDCR(LMR) / CRIS (Trunk P25 Phase-2)
848	774.29375		804.29375	1808	CDCR(LMR) / CRIS (Trunk P25 Phase-2)
849	774.30000		804.30000	1809	CHP(LMR)
850	774.30625		804.30625	1810	CHP(LMR)
851	774.31250		804.31250	1811	CRIS (Trunk P25 Phase-2)
852	774.31875		804.31875	1812	CRIS (Trunk P25 Phase-2)
853	774.32500		804.32500	1813	CHP(LMR) / CRIS (Trunk P25 Phase-2)
854	774.33125		804.33125	1814	CHP(LMR) / CRIS (Trunk P25 Phase-2)
855	774.33750		804.33750	1815	CRIS (Trunk P25 Phase-2)
856	774.34375		804.34375	1816	CRIS (Trunk P25 Phase-2)
885	774.52500		804.52500	1845	CHP(VRS)
886	774.53125		804.53125	1846	CHP(VRS)
887	774.53750		804.53750	1847	CRIS (Trunk P25 Phase-2)
888	774.54375		804.54375	1848	CRIS (Trunk P25 Phase-2)
889	774.55000		804.55000	1849	CHP(LMR) / CRIS (Trunk P25 Phase-2)
890	774.55625		804.55625	1850	CHP(LMR) / CRIS (Trunk P25 Phase-2)
891	774.56250		804.56250	1851	CRIS (Trunk P25 Phase-2)
892	774.56875		804.56875	1852	CRIS (Trunk P25 Phase-2)
893	774.57500		804.57500	1853	CHP(LMR) / CRIS (Trunk P25 Phase-2)
894	774.58125		804.58125	1854	CHP(LMR) / CRIS (Trunk P25 Phase-2)
895	774.58750		804.58750	1855	CDCR(LMR)
896	774.59375		804.59375	1856	CDCR(LMR)

State of California, 700 MHz Agency Channel Assignments

BASE CH #	BASE FREQ		MOBILE FREQ (+30)	MOBILE CH #		Agency / Location / Area
925	774.77500		804.77500	1885		CHP(LMR) / CRIS (Trunk P25 Phase-2)
926	774.78125		804.78125	1886		CHP(LMR) / CRIS (Trunk P25 Phase-2)
927	774.78750		804.78750	1887		CRIS (Trunk P25 Phase-2)
928	774.79375		804.79375	1888		CRIS (Trunk P25 Phase-2)
929	774.80000		804.80000	1889		CHP(LMR) / CRIS (Trunk P25 Phase-2)
930	774.80625		804.80625	1890		CHP(LMR) / CRIS (Trunk P25 Phase-2)
931	774.81250		804.81250	1891		CRIS (Trunk P25 Phase-2)
932	774.81875		804.81875	1892		CRIS (Trunk P25 Phase-2)
933	774.82500		804.82500	1893		CHP(LMR) / CRIS (Trunk P25 Phase-2)
934	774.83125		804.83125	1894		CHP(LMR) / CRIS (Trunk P25 Phase-2)
935	774.83750		804.83750	1895		CRIS (Trunk P25 Phase-2)
936	774.84375		804.84375	1896		CRIS (Trunk P25 Phase-2)